

## I Finality of the Prior Office Action

Applicant's discussion regarding the impropriety of the finality of the Office Action dated June 4, 2001, was not addressed in the current Office Action.

## II Traversal of the Rejections over the Cited Art

The Examiner rejected Claims 1, 7, 8, 14 and 15 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 5,903,478 to Fintel et al (Fintel). The Examiner rejected claims 3-6, 10-13 and 17-20 as being unpatentable over Fintel in view of "applicant's admitted prior art (AAPA) at pages 3-5, 25". Applicants traverse these rejections below.

### A. The Present Invention

The present invention discloses a technique for displaying and editing components of data which may have complex many-to-many (i.e., non-hierarchical) relationships, using a program such as a browser. The components are presented in such a way as to make the relationships explicitly visible, allowing a user to navigate the relationships in an efficient, intuitive manner that clearly aligns with the structure of the underlying object model. In a preferred embodiment, when the user selects one of the explicit relationships, he is presented with a list of actions tailored to that relationship. In a further enhancement, the user may define one or more filters that will be applied to the actions list before it is presented.

Independent Claim 1 recites "a subprocess for retrieving and displaying relationship information from said model when said selected element is a component of said model". Relative to this subject matter, Figure 181 of Fintel was cited. However, Applicants are unable to find this subject matter in this Figure. Figure 181 is described as illustrating "a process of establishing relationships between the objects that will be included in the symbol-based decision

rationale table." This does not teach, suggest or disclose "retrieving and displaying relationship information..." No relationship information is retrieved based on selection of an element from a model; no retrieved relationship information is then displayed. Further, Fintel does not discuss, teach or suggest an "object model" per se.

In the Office Exaction, numbered paragraph 1 claims that "elements of the model shown in Figure 181 are related to one another since they form a decision matrix." Figures 175-181 are described as illustrating "a process of establishing relationships; between the objects that will be included in the symbol-based decision rationale table" (column 5, lines 7-9). Later, column 43 lines 57-60 states that Fig. 181 shows "a display on a computer screen illustrating two dimensional table 18102" and that the "location dimension includes three location related objects." There is no discussion or description of an object model or the selection of an element that is a component of the object model or that any selection causes relationship information to be retrieved and displayed. Numbered paragraph 1 goes on to say that a user may edit relationships as illustrated in Figure 182. In column 44, the description of Fig. 182 states that a visual interface is invoked by selecting and activating an intersection. There is no discussion that the intersection is a component of an object model. There is no discussion that this causes relationship information to be displayed. Certainly, a menu box 18206 is shown in Figure 182 through which a user may create or delete a "relationship." But is this supposed to be the "displaying relationship information" limitation from Claim1? The rejection is based on Section 102. However, Applicant is having trouble understanding how the reference discloses each element of Claim 1. Applicant has repeatedly stated the differences between Claim 1 and Fintel. The present Office Action once again fails to indicate what in Fintel shows the object model recited in Claim 1.

Claim 1 also recites "a subprocess for enabling said user to select one or more relationships from said displayed relationship information". Relative to this subject matter, Figures 175 - 201 are cited. There is no apparent description or discussion of a user selecting a

relationship. There is no description or discussion of a user selecting a relationship from "displayed relationship information." Nothing is based on the selection of an element from an object model, as per the present claimed invention. Accordingly, Applicants submit that Fintel does not teach, suggest or disclose this subject matter.

In summary, the present invention is directed to the understanding of relationships, and its claims recite the concept that relationship information is displayed and that relationships are selectable by a user. This concept is not taught, suggested or disclosed in the cited art. This is the problem with the prior art that is addressed by the present invention. The logical elements, such as the classes and methods, presented in the pane, are selectable in the prior art. However, in a complex object model, this is not enough information. Other relationships exist which cannot be presented in the hierarchical format of the cited prior art. As discussed on page 11 of the Application, "relationships are explicitly represented as elements of the model, as are the objects (components) in that model...object models which are not strictly hierarchical in structure can be conveniently and intuitively navigated, edited, and populated using the present invention...relational databases typically have many complex relationships, which are not necessarily hierarchical in structure." Further, "by explicitly displaying the complex relationships of the relational model, the present invention enables a user to better comprehend the underlying model..."(page 12).

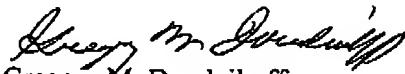
Accordingly, Applicants submit that independent Claim 1 patentably distinguishes over the cited art. Independent Claims 8 and 15 were rejected for the same reasons as Claim 1. Accordingly, it follows that these claims also patentably distinguish over the cited art, and it follows that the dependent claims also patentably distinguish over the cited art.

### III. Summary

Applicants have presented technical explanations and arguments fully supporting  
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their position that the pending claims contain subject matter which is not taught, suggested or disclosed by the cited art. Accordingly, Applicants submit that the present Application is in a condition for Allowance. Reconsideration of the claims and a Notice of Allowance are earnestly solicited.

Respectfully submitted,



Gregory M. Doudnikoff  
Attorney for Applicant  
Reg. No. 32,847

GMD:ld

Docket No: CR9-98-062  
PHONE: 919-254-1288  
FAX: 919-254-4330

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